UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Special Counsel for the Debtors and counsel to non-

Debtor Plaintiffs

In re:

Supor Properties Enterprises LLC, et al. 1,

Debtors.

Supor Properties Enterprises LLC: J Supor 136-1 Realty LLC; Supor-172 Realty LLC; Supor Properties 600 Urban Renewal, LLC; JS Realty Properties, LLC; Supor Family LLC; Supor Properties-400 Limited Liability Company; and the Marital Trust under the Last Will and Testament of Joseph Supor, Jr.,

Plaintiffs,

V.

American Dream Resorts, Ltd., RDA1: Supor Properties Enterprises LLC; RDA 2&3: Supor Properties Enterprises LLC; RDA 4: J Supor 136-1Realty LLC; RDA 5: Supor 172 Realty LLC; RDA 6: Supor Properties 600 Urban Renewal, LLC; Supor Studio City 2 LLC, Supor Studio City 3 LLC; Supor Studio City 4 LLC and Supor MT, LLC

Defendants.

Case No. 24-13427 (SLM) Judge: Stacey L. Meisel Chapter 11

(Jointly Administered)

Adv. Pro. No. 24-01174 (SLM)

Hearing Date: May 20, 2024

Hearing Time: 10:00 a.m.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Supor Properties Enterprises LLC (5580); J Supor 136-1 Realty LLC (3205); Supor-172 Realty LLC (EIN No. 5662); Supor Properties Breiderhoft LLC (7258); Supor Properties Devon LLC (6357); Shore Properties Associates North LLC (6707); Supor Properties 600 Urban Renewal, LLC (8604); JS Realty Properties, LLC (2497); and Supor Properties Harrison Avenue, LLC (1728).

DECLARATION OF ANDREA DOBIN

Andrea Dobin, of full age, hereby certifies and declares, pursuant to Title 28 of the United States Code, Section 1746, as follows:

- 1. On July 5, 2023, Supor Properties Bergen Avenue LLC ("Supor Bergen Avenue") filed a voluntary case under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of New Jersey, Case No. 23-15785 (SLM) (the "Supor Bergen Avenue Proceeding").
- 2. Pursuant to notice entered on November 15, 2023, the United States Trustee appointed me as the chapter 11 trustee for Supor Bergen Avenue. (Docket No. 85 in Supor Bergen Avenue Proceeding).
- 3. After my appointment as the chapter 11 trustee, I requested the leases for real property owned Supor Bergen Avenue.
- 4. Among other things, I received from BEB Bergen Ave, LLC, ("<u>BEB Bergen</u>"), the secured creditor of Supor Bergen Avenue, a Lease Agreement made as of January 1, 2023, between Supor Properties Bergen Ave, LLC and TeamDream Inc. A copy of this Lease Agreement is attached at **Exhibit "A"** hereto.
- 5. By letter dated December 27, 2023 (the "<u>Termination Notice</u>"), I noticed TeamDream Inc. ("<u>TeamDream</u>") of termination of its lease and I demanded that TeamDream vacate the premises. A copy of my letter of December 27, 2023, is attached at **Exhibit "B"** hereto.
- 6. In response to the Termination Notice, I received from Jesse David Eisenberg, Esq. two (2) Lease Agreements made as of January 1, 2023, between Supor Properties Bergen Ave, LLC and TeamDream Inc. (the "Purported TD Leases"). Copies of the Purported TD Leases are attached at **Exhibit "C"** and "**D"** hereto. The Purported TD Leases each contain a "Lease

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Agreement Addendum A" (the "Addendums"). The Addendums are not contained in the Lease

Agreement that I received from BEB Bergen. See Exhibit "A".

7. TeamDream requested from me a release of claims from the Supor Bergen Avenue

estate. I did not agree to a release.

8. On February 7, 2024, this Court entered an order confirming the third amended plan

of reorganization or liquidation for Supor Bergen Avenue (Docket No. 189 in Supor Bergen

Avenue Proceeding). I am the Plan Administrator under the confirmed plan.

I hereby certify that the foregoing statements made by me are true and that this Declaration

is executed under penalty of perjury. I am aware that if any of the foregoing statements made by

me are willfully false, I am subject to punishment.

Dated: May /32024

Andrea Dobin